

The City Attorney
City of San Diego
MEMORANDUM
236-6220

DATE: April 1, 1986

TO: Deputy Mayor Ed Struiksma

FROM: City Attorney

SUBJECT: Statement of Economic Interest

Your March 26, 1986 memorandum to this office requests our advice in respect to the proper reporting of complimentary tickets on your Statement of Economic Interest (SEI). Specifically, the tickets usually involve fundraising efforts and the ticket price varies significantly from the actual value of any dinner value or other benefit received. Your question is whether the SEI should reflect the face value of the ticket or the actual value of the meal.

Our office has previously provided written advice on this very subject. We have consistently held that, in appropriate reportable situations, the value of the dinner and not the face value of the ticket is to be reported. You should also be aware that some events are non-reportable such as political and charitable fundraisers. See attachments hereto. As a purported gift, the reportable threshold is fifty dollars (\$50) or more; or if considered to be income, two hundred and fifty dollars (\$250) or more. See, Gov't Code Sec. 87207(a)(1). I have attached for your information our Opinion No. 76-26, dated December 15, 1976 which addresses this situation.

In further support of the above-cited opinion, we direct your attention to FPPC Advice Letter No. A-84-015, dated February 17, 1984, also attached hereto. That Advice Letter is directly on point with your inquiry and consistent with our past advice to Council. The Advice Letter is very clear and we concur fully with the guidance provided therein.

We trust this resolves your concern. Please feel free to contact us if you have any further questions in this area.

JOHN W. WITT, City Attorney

By

Jack Katz, Chief Deputy

JK:smm:048.2.1

MS-86-3

Attachments:

City Attorney Opinion No. 76-26

FPPC Advice Letter No. A-84-015